

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-10361-NG
)
JOHN HANDY)

MOTION FOR LEAVE TO FILE MEMORANDUM IN EXCESS OF TWENTY PAGES

Defendant, John Handy, moves, pursuant to Loc. R. 7.1(b)(4), for leave of the Court to file a memorandum in excess of twenty pages in order to respond to the Court's August 1, 2006 request for briefing. As reasons therefore, defendant states that the Court's Order raises unusual and far-reaching issues concerning federalism and admissibility issues that requires an extended response.

JOHN HANDY
By His Attorney:

/s/ Timothy G. Watkins
Timothy Watkins
B.B.O. #567992
Federal Defender Office
408 Atlantic Ave., Third Floor
Boston, MA 02110
(617) 223-8061

CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on August 17, 2006.

/s/ Timothy G. Watkins
Timothy G. Watkins